

Kodiak Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Kodiak Aleutians Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2022 Annual Report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held on September 21-22, 2022, in Cold Bay the Council identified concerns and recommendations for this report. The Council approved this Annual Report at its March 29-30, 2023, public meeting held in Kodiak. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Kodiak/Aleutians Region.

1. Fisheries Enforcement Concerns

The Council expressed concerns over the lack of enforcement of fishing and hunting regulations across the region. They would like more presence of enforcement officers to monitor both sport and subsistence salmon fishing and enforce violations. The area of greatest concern is in Unalaska. The Council believes there are no Federal Wildlife Protection Officers based in the Aleutian Islands, and the lone Alaska State Wildlife Trooper based in Unalaska gets relocated to monitor the fisheries in Bristol Bay during the summer. The population of Unalaska is over 4,000 people, and there are a few salmon streams that are accessible from the road system and have weak returns. Some of the Council members have received reports from residents in Unalaska of numerous annual fishing violations without any officer to call other than the local police. The Council also expressed similar concerns for lack of enforcement in Kodiak and Cold Bay and is alarmed that these violations, particularly overharvesting, threaten the sustainability of salmon returns to streams utilized for subsistence. Lastly, the Council expressed appreciation for Tyler Lawson, Assistant Area Management Biologist for the Alaska Peninsula and Aleutian Islands, Alaska Department of Fish and Game (ADF&G), and Sergeant Nathan Walsh, Alaska State Troopers, for successfully addressing law enforcement concerns between the Council's fall 2022 and winter 2023 meeting.

2. The Proposed King Cove Road

The Council supports the King Cove Road project. The proposed King Cove Road will connect the communities of King Cove and Cold Bay through a portion of Izembek National Wildlife Refuge. This road would provide King Cove residents access to the airport in Cold Bay in the event of medical emergencies when the small airport in King Cove cannot be accessed due to weather conditions or darkness. The road will also facilitate residents of King Cove access to subsistence hunting, fishing, and gathering areas on the Cold Bay side. This has been a long-standing issue and the Council wants to see the project move forward.

3. Importance of Holding Meetings in Non-Hub Communities

The Council disagrees with the OSM policy that restricts meetings to be held primarily in hub communities. The Council also disagrees with the current list of communities that have been identified as hubs. The Council stressed the importance of occasionally meeting in some of the smaller communities or more remote communities where most residents are subsistence users. This effort would allow residents, including youth, the benefit of being able to attend a meeting and communicate their concerns about their local subsistence resources to the Council. In addition, this effort could lead to improved outreach about the Federal Subsistence Management Program, potentially increase Council membership applications, and result in a more diverse representation across the region.

4. Changing Ocean Conditions and Climate Change Are Having a Big Impact on Our Communities and Subsistence Lifestyle

The Council expressed many concerns over the vulnerabilities of communities and marine ecosystems to the impacts of climate change. The Council noted warmer summers and unpredictable weather patterns creating more forceful storms and ocean conditions that have made it increasingly more difficult for residents to safely access the ocean for subsistence, sport, and commercial fishing opportunities. At the same time, climate change affects fishery resources on which the community relies on for both subsistence and economic stability. The Council recognizes that the Board cannot do anything about climate change but wanted to ensure the Board was aware that the impacts of climate change are making life more challenging for all the communities in the region.

5. The Bipartisan Infrastructure Law (BIL) Should Have Funded Weirs

The Council expressed concerns that the BIL does not include funding for fish weirs. Weirs are important infrastructure and should be noted as such. The BIL provides funding to invest in health, equity, and resilience of communities. However, the Council feels the law stopped short of allowing funding for certain kinds of infrastructure and for agencies or entities with projects that support subsistence activities in rural Alaska, such as fish weirs. Salmon is one of the primary resources utilized for subsistence throughout the region. The Council stresses the importance of fish weirs, which are the most reliable method fishery managers have to estimate escapement of salmon, if they are available. If runs are poor for example, weir counts can

provide information to the managers allowing more fine scale management actions to lessen the impacts to access of subsistence resources if closures are necessary. The Council believes there is a strong tie between the need for the infrastructure and the impacts on access to subsistence.

6. Increased Access to Federal Subsistence Permits in Kodiak and Tidying up the Permitting Process

The Council expressed that the process of obtaining subsistence fishing and hunting permits is cumbersome and confusing. There are different Federal and State permits required for hunting and fishing and different permits for different fisheries, resources, and locations. The Council would like the process to obtain required permits to be easier for people wishing to subsist. Most of the smaller communities throughout the region do not have a local permit vendor, so a person wishing to hunt, or fish needs to either fly into Kodiak, Cold Bay, or Sand Point to get a permit or contact a Federal agency to obtain Federal permits. Chair Trumble noted that she has worked with the Izembek National Wildlife Refuge to have permit materials mailed to her for King Cove, which can be a good solution.

7. Lake Andrew Outlet on Adak Island Access to Sea is Blocked off for Fish due to Ocean Debris

The Council has concerns that the outlet of Lake Andrew on Adak Island is closed off from access to the sea due to ocean debris such as rocks and gravel. Lake Andrew is one of the island's major spawning areas for Sockeye Salmon and the area most utilized for subsistence by Adak residents. This blockage is directly impacting the Sockeye Salmon returns and subsistence opportunities. The lake is on Federal Lands, and the Navy is in the final stages of cleaning up sites contaminated with ordnance and remediation on the island. However, because of the cleanup efforts and for safety concerns, the Navy is preventing the community access to Lake Andrew to unblock the outlet. The Council is concerned that if fish cannot get up there to spawn, the run will die off, which will greatly impact subsistence. The Council said that help is needed to coordinate efforts to get the lake reopened. The Council acknowledges Jeff Williams, Deputy Refuge Manager for the Alaska Peninsula National Wildlife Refuge, for his progress working on this issue between the Fall 2022 and Winter 2023 Council meetings. The Council wishes to develop a plan for the Lake Andrew outlet blockage, in cooperation with ADF&G, USFWS, Aleut Corporation, City of Adak, and the US Navy.

8. Resources that Cross Regional Boundaries: Sharing of Information to Alleviate Misunderstandings and Pitting of One Region Against Another

The Council wants to ensure that we have access to good qualitative and quantitative data, especially in times when resources are constrained, or use is restricted. In addition, where resources span across different regions, such as the bird populations within the Arctic-Yukon-Kuskokwim Region or in Izembek National Wildlife Refuge (NWR), there needs to be opportunities for Councils to work together, share information, and acquire a better understanding about the resources. This will help the Councils to resolve issues that cross regional boundaries. The Council is thankful that OSM continues to facilitate the Council

working with other agencies, such as USFWS refuges, migratory birds and marine mammal's offices; National Oceanic and Atmospheric Administration Fisheries; and ADF&G, to make decisions on local resources as well as those that cross-over with other regions. However, there is still a need for better communication and understanding between the Regional Advisory Councils.

9. Proposed move of OSM from the U.S. Fish and Wildlife Service to the Department of the Interior, Assistant Secretary for Indian Affairs.

At their winter meeting on March 30, the Council was surprised to learn from the Department of the Interior (DOI), Assistant Secretary of Indian Affairs (AS-IA) that the President's budget includes a proposal to move OSM from the Fish and Wildlife Service to AS-IA. The Council has concerns that no one informed the Council and other user groups of this proposal earlier and that they were not involved with the process before the proposal was put into the President's budget. Likewise, none of the Tribes or communities within the Kodiak/Aleutians Region were notified of the Tribal Consultations from which this proposal apparently evolved. The Council strongly feels that DOI should seek wider public input in addition to just consulting with some of Alaska's Tribes before considering the move. The Council also would like to know what the deficiencies are that the move is seeking to address and what would this move "fix"? The Council also has concerns about the Federal Subsistence Management Program being run from Washington D.C. as well as the background in and knowledge of resource management by the Assistant Secretary for Indian Affairs. The Council believes USFWS is the best agency for subsistence management because of its background with natural resources and land management.

The Kodiak/Aleutians Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the Kodiak/Aleutians Region. If you have any questions regarding this report, please contact me via Lisa Hutchinson-Scarborough, Council Coordinator, Office of Subsistence Management, at lisa_hutchinson@fws.gov, or 1-800-478-1456 or 1-907-310-4097.

Sincerely,



Della Trumble
Chair

cc: Federal Subsistence Board
Kodiak/Aleutians Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Deputy Commissioner, Alaska Department of Fish and Game
Special Projects Coordinator, Alaska Department of Fish and Game

Administrative Record